GDPR Implementation Case Study: Data Inventory and Data Privacy Impact Assessment

JHB

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1. INTRODUCTION

The General Data Protection Regulation (GDPR) is the European Union's (EU) new Data Protection Regulations that take effect on 25th May 2018. In the UK, GDPR will take effect from May 2018 despite the fact that the UK is in the process of leaving the EU. In a recent public statement, the Financial Conduct Authority (FCA) and Information Commissioners Office (ICO) have jointly confirmed that UK organisations will be expected to adhere to the new regulations from 25th May 2018 (Financial Conduct Authority, 2018). Thus, GDPR will affect all organisations, but has particular implications for charities, who, like many other organisations, collect and process personal data. Having a detailed GDPR implementation plan and conducting Data Privacy Impact Assessments (DPIAs) helps organisations evaluate their readiness and ability to demonstrate GDPR compliance to the ICO. While GDPR may not necessarily require expert knowledge to implement, the requirements and obligations still require interpretation and many organisations struggle in fully understanding how best to conduct DPIAs and demonstrate compliance.

Most charities rely on public generosity for funding and in-kind support from volunteers to function and, as a result, many charities struggle to raise enough funding to meet all the objectives for their cause. Further, charities, as part of having charitable status, must be accountable and transparent in how they spend any money raised (Gov.UK, 2016). This means that charities often face conflicting demands on how best to spend funds received and deciding which issues take priority. Further, because of the nature of charitable work, a lot of the work is conducted by volunteers meaning that, even though a charity may collect and manage personal data, they often lack the resources and expertise to assess themselves against regulations such as GDPR.

This research seeks to help address the problem of implementing GDPR and conducting data privacy impact assessments (DPIA), working with a charity that provides advice, support and information to vulnerable people in the local area. The charity supports those suffering from addiction and substance misuse. As such, this charity needs to collect personal information from clients in order to provide them with the care, assistance and help they need for dealing with or overcoming their problems.

There are no current solutions for implementing GDPR or carrying out DPIAs in this context and therefore, this work will benefit not only this charity, but other charities with a vulnerable client base. Thus, this work will be conducted as a case study, designed to follow on from previous work that took Nissenbaum's Contextual Integrity (CI) Framework (Nissenbaum, 2010) to create:

PAM : a Practical Application Model (PAM) for how to assess privacy risks in Open Data (not published yet);

CLIFOD : Contextual Integrity for Open Data in Practice (CLIFOD), a privacy risk assessment questionnaire for assessing privacy risks in releasing data for publication Henriksen-Bulmer and Faily (2017).

The intention is that this case study will build on these models to create an accurate view of what data holdings.

2. PROTOCOL

The aim of this study is to assist a UK Charitable Organisation in implementing the General Data Protection Regulation (GDPR) by guiding them through the GDPR implementation process and provide guidance on how to conduct DPIAs going forward. Further, the study also aims to provide the charity with pointers to suitable tool-support that they can utilise in managing both the process and meta-data collected during the assessment. This work will be done as a case study, following the methodology of (Yin, 2013).

For this, a number of steps will need to be carried out starting with gaining an overview of what data the Charity hold and in what format so that an assessment can be made of the Charity's GDPR readiness. To this end, user stories will be collected to gain understanding of how staff and volunteers currently use and handle data as part of their daily work. The data gathered as part of this will then be used to create a data register of the Charity's data holdings and inform the remainder of the study.

To ensure the user stories are collecting appropriate and relevant detail, the work will start with a pilot study to validate the questions to be asked as part of the case study, full details can be found in the Methodology section below.

3. PROBLEM DEFINITION

To help organisations implement GDPR, ICO have published a twelve step guide in how to prepare for GDPR (ICO, 2017) which states organisations should:

1. **Awareness**: ensure that key stakeholders are aware of the change in the law brought by GDPR;

2. **Information**: seek to document their data holding by conducting an information audit;

3. **Communication**: Review and update privacy notices;

4. **Individual rights**: ensure they have procedures in place that adheres to individuals' rights, including any request for providing or deleting personal data;

5. **Subject Access Request**: ensure, as part of access request processes, they are able to meet and respond to such requests within the permitted time scales;

6. **Lawful basis for processing personal data**: identify and document under what lawful basis they processing data and update privacy policies accordingly;

7. **Consent**: review current processes for obtaining consent and make any necessary changes to comply with GDPR;

8. **Children**: assess whether any personal data collected or processed relates to children and, if so, ensure appropriate safeguards are put in place to verify client's ages and/or seek parental or guardian consent for any processing;

9. **Data Breaches**: create appropriate processes and procedures for detecting, reporting and investigating any data breaches involving persona data;

10. **Privacy by Design (PbD) and DPIAs**: familiarise themselves with how to implement data protection by design (a.k.a. Privacy by Design) and conducting DPIAs;

11. **Data Protection Officers**: designate an organisational Data Protection Officer, tasked with ensuring organisational compliance with GDPR;

12. **International**: where the organisation carry out any cross-border data transactions or processing, establish who is to act as lead data protection authority.

In the above list, data refers to any data or information the organisation collects, stores and/or processes that may, or could, be considered either personal or sensitive, i.e. personally identifiable information such as names, addresses, date of birth etc.

Thus, for our charity, they will need to carry out a number of actions in order to effectively implement and embed GDPR within the organisation's processes. However, like many charities, this organisation struggles with fully understanding how best to implement and comply with GDPR. They also find it difficult to find sufficient resource and time to demonstrate compliance with the regulation by May 2018.

The other problem that the charity faces concerns consent. As required by the data protection legislation (both the current Data Protection Act 1998 and the new General Data Protection Regulations) the charity seeks consent from clients for processing their personal data. However, clients' circumstances may change during the course of treatment or receiving

support and assistance that would necessitate obtaining consent again for additional processing of data at which points clients' may not be able to provide such consent due to the effects of addiction. Alternatively, because of the effects of addiction, the charities' clients may later claim that they lacked the mental capacity to provide informed consent when they went in for treatment which will undermine any demonstration of GDPR compliance, particularly when it comes to ensuring data subjects can exercise their right to be forgotten. The project will, time permitting, also look at how this issue may be addressed for the Charity.

3.1. ETHICS APPROVAL

Ethics approval for this case study was sought and granted from the University Ethics Committee.

4. RESEARCH QUESTIONS

The case study will seek to answer the following questions:

CS-RQ1 What data holdings does the Charity have, where and how are these handled currently and to what extent do these comply with GDPR standards?

CS-RQ2 What processes does the organisation need to put in place for effective GDPR implementation to demonstrate GDPR compliance?

CS-RQ3 How can the organisation ensure they have in place appropriate processes conducting DPIAs going forward?

5. HYPOTHESIS

It is hypothesised that:

CS-P1 Existing processes are not compliant with GDPR standards;

CS-P2 Current processes are inappropriate for supporting effective GDPR implementation;

CS-P3 The organisation does not conduct DPIAs as standard.

6. METHODOLOGY

The unit of analysis will be the organisation itself, in this case 'the Charity' as GDPR will affect all aspects of the organisational handling of data.

In order to answer the research questions the case study will be carried out in four phases:

Phase 1 - Data Holdings Assessment : assessing what data the Charity's currently collects, stores and processes and how this data is collected, handled, stored and shared (processed) this will take the form of collecting user stories (Bruner, 1986; Rooney et al., 2016).

Phase 2 - Analyse: data holdings to create a Data Register : based on the findings from phase 1, a register of the organisation's data holding will be created to gain an overview of what personal data the Charity holds, where it originated from and who they share the data with.

Phase 3 - GDPR Process Guidance : an assessment will be made of how the organisation can best demonstrate compliance with GDPR principles in order to develop appropriate guidance as to what processes and actions the Charity will need to put in place to demonstrate GDPR compliance.

Phase 4 - DPIA : develop Data Privacy Impact Assessment (DPIA) process for data handling going forward.

However, assessing the data holdings in Phase 1 will require a series of questions to be asked as part if the user story collection. To ensure these questions are relevant, valid and correct a Pilot study will be conducted.

7. PILOT STUDY

The work will commence with a pilot study, designed to assess and validate the quality of the questions to be used in phase 1 for the user stories. According to Yin, an appropriate way to validate is through triangulation (Yin, 2013). Therefore, for the user stories, the questions will be validated through consultation with 3 independent parties who will be asked to complete the user stories from the perspective of their work.

The intention with collecting these user stories is to get users to formulate in their own words how they use data as part of their daily work. Therefore, to validate the questions and ensure these are appropriate, non-biased and in line with what we are trying to achieve, the questions asked will be validated. The validation will be twofold, first, 3 academic reviewers with experience in conducting case studies will be asked to comment on the quality of the questions and make any suggestions from improvements. Second, three independent reviewers will be asked to take part in a pilot study, providing their user stories.

7.1. PILOT USER STORIES SPREAD SHEET

The academic reviewers will be supplied with a spread sheet that will consist of one tab with the first row being a strap-line that reads: Typical Day Story Board. This is then followed by a section for the user to fill in their role or job title.

1. **Tag**: to elicit a tagline for the story being described;

2. **Communication with/data accessed via**: to elicit details of how the data is accessed or, if in person, who the communication is with;

3. **Physical location of user**: to establish where the story takes place;

4. **Data handling method/Device used**: to establish how the data is collected and the type of device used;

5. **Please make an entry for every time data is handled/processed/discussed during a typical day**: for the main narrative of the story, this has intentionally been left vague so that users will use their own style and use words and phrases come naturally to them. Also, this way, the users are more likely to use terminology most commonly used in the environment under study;

6. **How often does this scenario occur?**: This is intended to collect information of the scenario frequency;

7.2. ACADEMIC FEEDBACK

Having reviewed the questions, the feedback from the academics was that, for clarity, it would be useful to add the following questions to the spread sheet:

1. **How long does this scenario take?**: to establish a timeframe;

2. **Please indicate how demanding you find this task, please explain your reasons**: to understand the users mindset as the story unfolds;

3. **Does this task interfere with any other tasks?**: to elicit level of disruption (actual or perceived);

4. **Comment**: for the pilot study element only, to allow pilot users to add comments about the experience and/or quality of the questions.

Further, the academics also suggested it may be useful to provide some examples for the users to illustrate what is meant by each question asked and therefore, two general examples were devised around general office work and added to the pilot user spread sheet (see Appendix A).

7.3. PILOT USER STORIES

For the pilot study, three independent participants were recruited. To ensure these participants did not have any links to the Charity or know any of the Charities employees or volunteers, two of the participants were recruited from outside the local area, the third confirmed that they had no links with any charities in the local area that deal with vulnerable people or their staff.

In line with the case study aims, each of the pilot participants will be provided with a participant information sheet (see Appendix C) and asked to complete a participant agreement form (see Appendix B). Upon agreeing to take part in the pilot study, the pilot participants were then asked complete a user story spread sheet, describing their duties or tasks as part of a typical day.

The pilot study participants all completed the questionnaires with no problems. None of them raised any issues over the questions or the format of the questions.

Interestingly, while two participants provided details of a few different scenarios of when they collect or handle data as part of their day, the third participant chose to use the spread sheet itself as part of the story. What this participant chose to do was to recount their week and the tasks they handle each day/part day. Then, as part of the story they described what data they handle at each stage, telling the story of their week, detailing what happens to the data they handle as the story is recounted over the week. This would indicate that the aim of having participants use their own words and style was effective.

8. PHASE 1 - DATA HOLDINGS ASSESSMENT

Phase 1 involves to creating an accurate view of what data holdings the Charity currently has. This will involve assessing what data holdings the Charity current have and how data is processed and shared both within the organisation and externally.

Relating this to previous work, in terms of PAM and CLIFOD, this equates to the explanation phase where we need to gather details about the data, the actors, their roles, and how the data is transmitted. However, in this instance, this does not involve assessing a particular dataset, rather, it involves piecing together an overview of what data the Charity holds and how the data is used, stored and shared. Therefore, this phase will consist of gathering information about what personal data the Charity currently collects, the format the data is collected in, how the data is processed and what stakeholders might utilise or access the data both internally and externally and and how this process occurs.

To this end, phase one will begin by collecting user stories from staff and volunteers about how they currently use and process data and who they might share it with, using Storytelling as the research method (Bruner, 1986; Rooney et al., 2016).

Storytelling as a research method is used to understand users. It involves collecting stories or narratives to generate output. This may involve collecting narrative analysis whereby the researcher will recount a narrated event to produce a story, or 'paradigmatic' analysis of narratives or stories to conceptualise occurrences, tasks, ideas or events and produce categories of typical occurrences (Bruner, 1986). This method has been used in Psychology (Bruner, 1986), software design (Desilets, 2008) and IT and business research (Rooney et al., 2016) to name but a few.

This method has been chosen because of its simplicity. The intention is to get users to tell the researcher about their work and how, as part of this they handle data or information. This will allow users to recount their working day as a story in their own words which will provide valuable insight for the researcher into how data flows between stakeholders and what is captured where, when and how.

8.1. USER STORIES - DATA COLLECTION

To establish data flows and holdings within the Charity, users (or participants), in this case staff or volunteers who work with the Charity, will be asked to provide their user story by completing a spread sheet detailing occurrences during a typical day where they collect, process, share or otherwise handle personal data as part of their daily tasks.

The spread sheet that participants will be supplied with will be in the same format and contain the same questions as described in the pilot study above.

The format of the questionnaire has deliberately been kept brief as the intention is to allow users to use their own words and phrases as they would when telling a story. The reason for this is firstly that this will provide the researcher with understanding how staff carry out the task being described. Second, this method will also providing valuable insight into what documents, forms, devices etc. the participants use as part of performing a task or completing a scenario that may otherwise be missed if too much has been pre-empted in the questions. However, to help users, two slightly different examples have been provided for this study. These have been typed in red italic font as to indicate they are merely examples and inserted in the first two rows of the spreadsheet.

The examples read as follows:

Example 1

1. **Tag**: 10 am meeting with client;

2. **Communication with/data accessed via**: Client;

3. **Physical location of user**: Office;

4. **Data handling method/Device used**: Manual, paper record & email (computer);

5. **Please make an entry for every time data is handled/processed/discussed during a typical day**: Met with AB, this was our first meeting. We went through the application form together and filled it in. Then, once the form was completed, both AB and I signed the form. I then gave AB a copy of the house rules. After the meeting, I copied the application form and filed the original in the filing cabinet in the common room. I then scanned and emailed a copy to admin and asked them to create an account for AB;

6. **How long does this scenario take?**: The meeting lasted 1.5 hours, I then spent another 20 minutes doing the paperwork;

7. **How often does this scenario occur?**: about 2-3 times each Month

8. **Please indicate how demanding you find this task, please explain your reasons**: This is quite a time consuming task and it can be emotionally draining as I have to be mindful the whole time of the client's feelings and needs. The admin aspect can be a bit of a cumbersome bind;

9. **Does this task interfere with any other tasks?**: When I am in a meeting with a client no-one usually disturbs us. The phone is put on silent and there is no computer in the meeting room. However, as soon as the meeting finishes and I get to the admin part, there tends to be constant interruptions.

Example 2

1. **Tag**: evening, 8 o'clock - checked emails

2. **Communication with/data accessed via**: Server;

3. **Physical location of user**: Home;

4. **Data handling method/Device used**: Home computer;

5. **Please make an entry for every time data is handled/processed/discussed during a typical day**: Logged into emails, there were two emails that I needed to respond to. One concerned AB who had an argument with one of the other housemates. The case worker on duty had completed a complaint form. I downloaded the form and checked through it. I then signed it and uploaded the signed copy to the system;

6. **How long does this scenario take?**: About an hour;

7. **How often does this scenario occur?**: Every day

8. **Please indicate how demanding you find this task, please explain your reasons**: The task was not difficult, more disappointing because there had been a problem which will result in a lot of extra work for everyone involved. I will need to spend some time now doing reports etc.when I get into the office in the morning;

9. **Does this task interfere with any other tasks?**: Not really, I do not have to check emails from home but chose to so I don't arrive in the office the next morning to too many surprises.

8.2. User Story Data Collection

For the data collection the participants will be the any member of staff and/or volunteer who works and handles data as part of their work at the Charity. Therefore, to be effective, all staff and volunteers who handle data will need to take part in the study. To achieve this will require collaboration and assistance from the Management team within the Charity in order to collect the data. To this end the following format will be adopted for collecting the user stories from participants:

1. The researcher will email the Manager of the Charity and ask them to circulate the user story spread sheet together with a participant agreement form for them to complete. Attached to the email will be:
    a) A participant information sheet for staff and volunteers (see Appendix D;

b) A participant agreement form (see Appendix B);

c) The user story spreadsheet.

2. The Charity Manager will email or circulate paper copies of the participant form and spread sheet to all staff members who process data asking them to complete the forms;

3. The Manager will collate the responses from staff and forward these to researcher within an agreed time frame to be agreed between the Charity Manager and the researcher.

9. PHASE 2 - ANALYSE: DATA HOLDINGS TO CREATE A DATA REGISTER

This Phase involves analysing the data gathered from the user stories collected from staff and volunteers to produce an outline data register. This will involve analysing the data collected from users to created an outline data register of the Charity's data holdings. In addition, a list of documents and forms used by the Charity for gathering information will be collated and compared with information gathered from the user stories and added to the data register.

9.1. FORMS AND DOCUMENTS - DATA COLLECTION

As part of phase 2, additional data will be gathered about what forms and documents the Charity use for different scenarios. This will involve liaising with the Charity management team to collect copies of, or details of, all the forms and documents the Charity uses to collect and store information.

From these information about exactly what type of data is collected can be gleaned and added to the data register. This will allow the information pertaining to the Charity's data holdings to be mapped to PAM and analysed to create a Data Register for the Charity.

9.2. DATA REGISTER - DATA COLLECTION

The data register will be created based initially on findings from the user stories analysis. Once this analysis has been carried out details of the forms and documents used within the Charity will be added to the register. This will involve analysing exactly what data is collected, processed or shared within each document or form and categorising this data based on attribute types and data sensitivity. It may transpire as part of this analysis that not enough information is available and clarity needs to be sought. If this is the case, clarity will be sought through email exchange and/or semi-structured or contextual interviews.

9.2.1. DATA REGISTER - SPREAD SHEET

The data register will be captured in a spread sheet initially with a view to load this information into a support tool, such as CAIRIS, at a later stage if time allows. As a starting point, the spread sheet will consist of the following columns and headings:

ID Each document or form will be given a unique identifier (*numerical*);

Date Document date;

FormName The name of the document or form (*text*);

DocType The type of document (e.g. template, form type such as application form, assessment etc.) (*drop-down list or text*);

DocFormat The format of the document (e.g. spread sheet, csv, office etc.) (*drop-down list or text*);

NoAtt The number of attributes (columns or data groups) captured on the form (*numerical*);

AttNo1....* A column will be created and assigned to each attribute based on the number of attributes captured in the previous column (with no maximum limit) (*text*);

AttType Each attribute will be categorised according to attribute type (i.e. identifier, quasi-identifiers, sensitive, non-sensitive) (*drop-down list*);

Origin Where the form or document originates from (*text*);

NoUses The number of different uses the form or document has (*numerical*);

UseNo1....* A column will be created and assigned to each use based on the number of uses noted in the previous column (with no maximum limit) (*text*);

StorageMet Method of storing the form (if multiple, create multiple columns, one for each method) (e.g. electronic, paper)(*text*);

StorageLoc Location where the data is stored (if multiple, create multiple columns, one for each location) (*text*);

MinRetention Information about any minimum retention period applicable for storing the data (*text*);

MaxRetention Information about any maximum retention period applicable for storing the data (*text*);

Disclosure Details of who the data is/may be disclosed to (*text*);

This list is not exhaustive, more columns will be added as part of the analysis.

Concurrent with this analysis, a second round of data collection will be carried out to collect details of all forms and template documents created by the Charity in the course of their work. To create this list, the Management team at the Charity will be asked to provide the researcher with blank copies of all the template forms and documents used by the Charity (i.e. forms that have not been completed). From this, a draft list of forms and documents will be created and added to the data register.

9.2.2. DATA REGISTER VALIDATION

To validate the completeness of the list of forms, the following validation exercises will be carried out:

- The list will be compared with information provided in the user stories to ensure no documents or forms have been mentioned that are not on the list;

- The list will be emailed to the Management team, asking them to verify that no other templates are used or, if any are missing, provide copies to the researcher;

9.3. LIFE OF THE FORM - DATA COLLECTION

Once the list of draft list of forms and documents has been verified, a third round of data collection will begin. This time to capture details of 'the life of the form'.

This will mean conducting another study to obtain details from users about how the use the forms and documents that have by now been collated. The format of this study's data collection will be the same as the format used for collecting the User Stories. However, the questions asked on the spread sheet circulated will be different.

9.3.1. LIFE OF THE FORM - SPREAD SHEET

For this element, the data collection will start by taking an extract of the draft data register and creating a spread sheet with all the forms listed on it.

Users will then be asked to complete 'the story of the life of the form'. This exercise will be similar to the capturing of user stories only this time, users will be asked to provide details of:

Birth Where was the form born, who created it and why?

Intended uses What is the form intended for?

Actual uses What is the form actually used for?

Regularity How often is the form used?

Who Who fills in the form?

When In what circumstances is the form filled in?

Why Why is the form filled in?

Format What format is the form in (e.g. manual paper based or electronic);

Journey What happens to the form next (this part is cyclical and applies every time the form travels) when:

    1. It gets completed or it travels?

    2. Where does it go?

3. Who is present?

4. Who sees the form?

5. Who can access the form?

6. How long does the form stay there?

7. Where does the form go next (this may be multiple places)?

Home Where is the form kept or stored (where does the form live)?

1. does it get moved from it's home (if yes, then then back to the journey)?

StorageFormat In what format is it kept or stored?

Access Who can access the form once it is stored?

Retention How long is the form stored for?

Disposal How does the form get disposed of?

Like the draft data register list, this list of questions is not exhaustive.

9.3.2. Life of the Form - Validation

To validate the life of the form questionnaire, the following actions will be carried out before the questionnaire is sent to the Charity users for completion:

1. *GDPR* An analysis of GDPR data principles and standards will be carried out to ensure questions have been created that cover all aspects of GDPR principles within the questions asked;

2. *Pilot* The questionnaire will be piloted by asking 3 independent parties to complete it and comment on the clarity of the questions asked.

Once users have completed the 'life of the form' list of questions, all data gather will again be analysed and the data register will be updated. It may prove necessary, as part of this analysis, to seek further clarification. This may take the format of email exchanges between the researcher and users or, it may take the form of semi-structured interviews.

The outcome of this analysis will be the completed Data Register which will be handed over to the Charity for them to maintain going forward.

Data collected in Phase 1 and 2 will provide the basis for answering CS-RQ1: *What data holdings does the Charity have, where and how are these handled currently and to what extent do these comply with GDPR standards?* and, it is expected, confirm hypothesis CS-P1, that existing processes within the Charity are not compliant with GDPR standards.

10. PHASE 3 - GDPR PROCESS GUIDANCE

Based on the findings from Phase 2, a guidance document will be created for the Charity in Phase 3. This document will outline what steps and procedures the Charity should consider putting in place to implement GDPR that will enable them to demonstrate compliance with GDPR.

To prepare this document, the following steps will be carried out:

1. Existing privacy policies to be reviewed and revised as necessary;

2. Review the Charity's existing processes for obtaining client's consent and revise as necessary;

3. Establish what processes exist for meeting data subject rights (GDPR, Chapter III);

4. Arrange staff training on GDPR.

This work will centre on identifying and helping the Charity prepare appropriate documentation and processes that will enable them to demonstrate GDPR compliance. The resulting report will outline what work has been carried out and identify any additional processes and procedures the Charity should consider putting in place to complete their GDPR implementation. Further, the report will also make recommendations as to what next steps the Charity should follow to be able to demonstrate compliance with GDPR. This report will provide the answer to CS-RQ2: *What processes does the organisation need to put in place for effective GDPR implementation to demonstrate GDPR compliance?* and, confirm or otherwise hypothesis CS-P2 that current processes are inappropriate for supporting GDPR implementation.

10.1. PRIVACY POLICY REVIEW

As part of the process guidance review, the Charity's privacy policies will be reviewed and revised to ensure they align with the GDPR regulations. GDPR requires privacy policies to be "concise, easily accessible and easy to understand" and to this end, any policy must be written in "plain language" (GDPR, Recital 58).

10.2. STAFF TRAINING

Another aspect of GDPR implementation is to ensure staff are aware of their responsibilities as regards handling client's data and to this end some staff training sessions will be arranged. This will serve two purposes, first, it will enable staff to be informed of the changes brought in by GDPR and second, it will serve as an opportunity to evaluate the DPIA framework.

10.3. PHASE 4 - DPIA

In Phase 4, a DPIA will be developed based on the outcome of Phases one to three. Further, PAM and CLIFOD will be utilised to inform the design of the final DPIA framework.

This DPIA will be trialled in collaboration with the Charity following the Case Study protocol utilised in the CLIFOD Case Study.

It is expected this phase will confirm CS-P3, that the Charity does not currently conduct DPIAs as standard.

The DPIA produced for this case study will be shared with the Charity for their use going forward. This phase will provide the answer to CS-RQ3: *How can the organisation ensure they have in place appropriate processes conducting DPIAs going forward?*.

10.4. DPIA EVALUATION

The DPIA produced for this case study will be evaluated in two steps. First, it will be evaluated as part of a series of staff training sessions (see Section 9.4.1) and second, it will be evaluated in a series of seminars to be held as part of the end of case study workshop planned to take place at the end of the case study (see Section 9.4.2).

10.4.1. STAFF TRAINING

As part of the GDPR implementation staff training will be provided (see Section 9.2).

The intention was that the staff training will serve a dual purpose;

1. The training sessions will be used to update staff on the changes brought in by GDPR, help them identify ways they can incorporate these changes into their working practices;

2. Training sessions will be used as an opportunity to evaluate the DPIA framework.

To pre-empt potential resistance to change Demirci (2016) and help staff gain as much knowledge as possible from the training, the learning material for the staff training sessions will be designed to focus on how staff can be encouraged to embed good privacy practices into their working practices in data processing. Adopting this type of approach to devise learning outcomes has been shown to have long lasting effectiveness Moon (2004). In order to focus learning material to best support learning, students need to be empowered to believe themselves to be "knowers". This entails using material or examples from learners experience bank so that "mutually constructive meaning? may be achieved from the training Baxter Magolda (2004). To this end, transformative learning theory was used to focus the learning material on events and scenarios observed by the researcher during site visits in the early phases of the project Mezirow (1997). This, it is hoped will help staff relate better to the the training materials and help them see how they apply this to their work.

10.4.2. WORKSHOP

A further evaluation will take place in a one day workshops. This workshop will be devised to inform other charities about GDPR and provide them with some hands-on experience of conducting DPIAs using the DPIA framework. The intention is that 50 attendees will be invited to attend the workshop from local charities within the local area. The workshop agenda can be found in Appendix F.

For the practical element of the workshop, attendees will be divided into four seminar groups to ensure each attendees gets an opportunity to participate in the discussion around privacy risks. Four facilitators will be recruited to facilitate these seminar sessions, the instructions for the facilitators will be attached in Appendix G.

As part of both the staff training session and the workshop seminar, participants will be given an information sheet (see Appendix E for copy) and asked to complete a participant agreement form (see Appendix B). Further, as part of the session, they will be provided with a handout (this will be attached in Appendix H) and asked to provide feedback by completing an evaluation questionnaire, this will be attached in Appendix I.

After the session, facilitators will also be asked to provide feedback on how they felt the session went, a copy of the de-brief form will be attached in Appendix J.

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Appendices

These questions were added to the pilot user story spreadsheet.

A further suggestion was made to add an example or two to provide users with some idea of what is expected. This might help elicit more detailed responses.

To this end, the following examples were added to the spread sheet (first two rows completed):

Example 1

1. **Tag**: am - meeting with client;

   2. **Communication with/data accessed via**: Client;

   3. **Physical location of user**: Office;

   4. **Data handling method/Device used**: Manual, paper record and email (computer);

   5. **Please make an entry for every time data is handled/processed/discussed during a typical day**: Met with AB, this was our first meeting. We went through the list of orders and agreed which ones needed invoicing. I then processed those records and created an invoice for each client. This involved inputting the client details onto the system together with the list of items ordered and the prices. The system calculates the VAT and totals automatically but I always check to make sure the prices are correct as sometimes, the prices come up wrong. If that happens, I have to get in touch with the order team so they can update the prices before I can create the invoice;

   6. **How long does this scenario take?**: The meeting lasted about 2 hours, I then spent another 4 hours creating the invoices;

   7. **How often does this scenario occur?**: we invoice once a week

   8. **Please indicate how demanding you find this task, please explain your reasons**: This is quite a time consuming task but as long as all the prices are correct, it is not difficult. I do need to be vigilant with the checking though as we don't want to send an incorrect invoice out;

   9. **Does this task interfere with any other tasks?**: When I am in a meeting with a client no-one usually disturbs us. The phone is put on silent and there is no computer in the meeting room. However, as soon as the meeting finishes and I get to the admin part, there tends to be constant interruptions.

Example 2

1. **Tag**: pm - checked emails

   2. **Communication with/data accessed via**: Internet;

3. **Physical location of user**: Home;

4. **Data handling method/Device used**: Home computer;

5. **Please make an entry for every time data is handled/processed/discussed during a typical day**: Logged into emails, there were two emails that I needed to respond to. One concerned the system upgrade planned for tomorrow morning, I needed to respond to make sure this does not happen until I have run the backup;

6. **How long does this scenario take?**: About 20 minutes;

7. **How often does this scenario occur?**: Every day

8. **Please indicate how demanding you find this task, please explain your reasons**: The the task was not difficult, more disappointing because the IT team could have informed me sooner so I could have done the backup before I left today. Now I have to go in early tomorrow;

9. **Does this task interfere with any other tasks?**: Not really, I do not have to check emails from home but chose to so I don't arrive in the office the next morning to too many surprises.

B. Participant Agreement Form

Full title of the project	
Name, position and contact details of researcher	
Name, position and contact details of supervisor (if the researcher is a student)	

Question	Please initial or tick here to confirm agreement
I have read and understood the participant information sheet for the above research project	
I confirm that I have had the opportunity to ask questions	
I agree to take part in the above research project	
I understand that my participation is voluntary	
I understand that I am free to withdraw up to the point where the data are processed and become anonymous, so my identity cannot be determined	
During the task or experiment, I am free to withdraw without giving reason and without there being any negative consequences	
Should I not wish to answer any particular question(s), complete a survey or questionnaire I am free to decline	
I understand that all data will be anonymised and I give permission for members of the research team to use my identifiable information for the purposes of this research project	
I agree to the interview being recorded and understand this recording will be used for transcribing purposes and anonymised direct quotes may be used	
Name of Participant	
Date and Signature	
Name of Researcher	
Date and Signature	

Table 1: Participant Agreement Form

This form should be signed and dated by all parties after the participant receives a copy of the participant information sheet and any other written information provided to the participants. A copy of the signed and dated participant agreement form should be kept with the project's main documents which must be kept in a secure location.

C. Participant Information Sheet - Pilot Study

"First of all, thank you very much for agreeing to take part in this pilot to trial our user story questionnaire, we really value your input, time and comments.

BU has a working relationship with a charity that provides information, advice and support for those vulnerable people. Like many organisations, they struggle to understand how best to implement GDPR, and finding sufficient time and resources to demonstrate compliance with the regulation by May 2018.

We will be collaborating with this charity first of all, to gather information about what data they work with and how this happens by asking them to complete a user story questionnaire. The user stories we want to capture are those that involve any form of data processing .

The idea is that we will ask each member of staff/volunteer etc. within the organisation to complete their user story for us for any task that that user carries out as part of their daily work, whether that is at work, in the field or at home that involves handing information and/or data.

We will then use this information to help us better understand how data is collected, handled and shared both within the organisation, externally and with any third party stakeholders.

However, we are conscious that we want to collect quality information from the participants without being too prescriptive in what we collect, as we want them to use their own words in describing and explaining what they do as part of their job.

Therefore, we have asked you to help us by trialling a pilot version of our questionnaire and then providing some feedback for us.

To explain, we have provided a couple of examples of instances when an invoice clerk might handle data.

What we would like you to do is to complete the attached user story questionnaire for your role or job by describing the times during your typical working day that you handle data for us. Please complete a row for each occurrence.

Then, we would also like you to comment on the questions that we ask and whether these make sense to you. If you feel there is something that needs explaining further or requires re-phrasing to make sense. A comment section has been provided at the end of the questionnaire for you to write your observations and feedback.

Once again, thank you for agreeing to participate, we really appreciate your help."

D. Participant Information Sheet - User Stories

The Participant information sheet for staff and volunteers, states:
"The Charity", like many organisations, struggle to understand how best to implement GDPR, and finding sufficient time and resources to demonstrate compliance with the regulation by May 2018.

To help with this, BU are working with "the Charity" to assist with GDPR implementation and, as part of this, the Research Assistant, is conducting a case study that will help "the Charity" implement GDPR and demonstrate compliance.

For this study, first of all, we need to gather information about what data the charity works with and how this happens. To this end, we would like to start by gaining an understanding of how you, as a staff member, use information as part of your daily work by completing a user story questionnaire (attached).

The user stories we want to capture are those that involve you handling any form of data or information. That may be as part of a conversation, in writing or processing information electronically .

The idea is that we will ask each member of staff/volunteer etc. within the organisation to complete their user story for us for any task that that user carries out as part of their daily work, whether that is at work, in the field or at home that involves handing information and/or data.

We will then use this information to help us better understand how data is collected, handled and shared both within the organisation, externally and with any third party stakeholders.

To explain, we have provided a couple of examples of instances when a fictitious case worker might handle data. We appreciate that there may be many more instances in a typical working day but these are only intended as examples.

What we would like you to do is to complete the attached user story questionnaire for your role or job by describing the times during your typical working day that you handle data for us. We would like you to tell the story of what happens/what you do with the form/data as part of the scenario. Please complete a row for each occurrence or scenario.

If you have any questions or queries, please feel free to either speak with your supervisor or contact the Research Assistant.

For research and ethical purposes, we also need for you to complete a participant sheet which explains how the data we collect will be used as part of our research. This form is at the end of this document. Please complete and sign this form and return it to us together with the completed user story questionnaire.

Finally, we would like to take this opportunity to thank you very much for assisting us with this work, we really value your input, time and comments."

E. Participant Information Sheet - Training and Workshop

The Participant information sheet used for the training sessions and the seminar sessions held as part of the one day workshop, states:

"Charities, like many organisations, struggle to understand how best to interpret and implement the new General Data Protection Regulations (GDPR) that came into force on 25th May 2018.

The University (BU) has been working with a local charity ("the Charity") assisting with putting in place suitable processes and practices to implement GDPR and demonstrate compliance. As part of this a Data Protection Impact Assessment (DPIA) Framework has been devised, the DPIA Data Wheel.

This DPIA Data Wheel was created so that the Charity is able to document and keep a record of the outcomes of each DPIAs they conduct. More importantly, the DPIA Data Wheel has been devised with any Charity in mind and can be used by any charitable organisation to conduct DPIAs and demonstrate compliance with GDPR going forward.

For example, for the Charity that took part in this study, the records they now have of the DPIAs conducted so far will aid not only in demonstrating compliance with GDPR to the Information Commissioners Office (ICO), but also the Care Quality Commission (CQC) who have also indicated that they must be kept informed as any breach could affect the care of the clients the charity work with.

Having created a DPIA process for assessing the privacy risks of any new and existing projects, we are going to go over this today. In particular, today's Seminar session is an opportunity for you to understand the DPIA Data Wheel and how to use this in conducting your own DPIAs going forward. To this end, you will be provided with a Scenario of a process the Charity use for gathering personal information about their clients.

The plan for today is:

1. Read the Scenario in the leaflet being handed out;

2. Discuss the responses to the DPIA Data Wheel for this Scenario. In particular, the questions pertaining to context;

3. Discuss what risks might be associated with the Scenario and complete the risk register for the Charity.

If you have any questions or queries, please feel free to either speak with your facilitator or contact the lead Researcher direct via email on ....

For research and ethical purposes, we also need for you to complete a participant sheet that explains how the data we collect will be used as part of our research. This form is at the end of this document. Please complete and sign this form and return it to us together with the completed user story questionnaire.

Finally, we would like to take this opportunity to thank you very much for assisting us with this work, we really value your input, time and comments."

F. WORKSHOP AGENDA

	GDPR for Charities: How to conduct a DPIA
9:00	Coffee
9:15	Opening
9:30	Basics of GDPR & overview of the DPIA Data Wheel
10:00	DPIA worked example
10:15	Coffee Break
10:30	Seminar Groups; practical session conducting DPIA
12:00	DPIA review - seminar groups to report outcomes from sessions
12.30	Lunch
13:30	Charity representative gives talk about the experience of working with the research team
14:00	Finding security & privacy risks - talk
14:30	Panel discussion
15:30	Coffee Break
16:00	Next steps
16:30	Close

Table 2: Workshop Agenda

G. Facilitator Instructions

Facilitator handout - DPIA Seminar Sessions

You have kindly agreed to act a facilitator for one of the DPIA Seminar Sessions that are scheduled to be part of the GDPR for Charities: How to conduct a DPIA Workshop on Monday 11th June 2018.

First, thank you very much for agreeing to help out on the day.

We are expecting 50 participants on the day and are planning to have 4 seminar groups. Therefore, you will be facilitating a group of approximately 12 participants. The participants will all be staff or volunteers working in a not-for-profit organisation with an interest in understanding more about GDPR and how to conduct DPIAs.

These are your instructions for how to conduct the seminar, please do not hesitate to ask however, if you have any questions or need any clarification on any aspect of these instructions, the seminar or anything else.

Your role Your main role as Facilitator is not to answer the questions, rather to facilitate and guide the conversation and perhaps give pointers so that the participants come up with the answers and suggestions.

You will however, be making notes of the responses in the spreadsheet that you will be provided with. These notes that you capture will be used as part of my research so, once again, I am most grateful for your help with this.

Handouts for Participants:

- Participant information sheet and participant agreement form.

- The information sheet gives participants brief details of the session and what we are trying to achieve and the participant agreement form is basically asking for their consent for me to use the outcomes of the seminar as part of my research. A copy of this form is attached to these instructions for your information

- Participant handout.

- Prior to the seminar session, participants will have been talked through GDPR and the DPIA Data Wheel. The handout is a reminder of these concepts and provides participant with information about GPDR and the DPIA Data Wheel. Again, a copy of this handout is attached for your information.

- Evaluation form. This is a basic questionnaire asking for feedback on the session, copy attached for your information.

Facilitating the session itself

The session itself is about the DPIA Data Wheel. The scenario participants have been given is one that seeks to take a predominantly paper driven process and making it electronic, using a tablet. Changing this process will change the risk landscape for what might or might not happen when the tablet is used for capturing the data and this is what the session is about.

The participants will have already been talked through the concepts and shown a demonstration of the DPIA Data Wheel.

At the start of the session

The first thing I would like you to do is to hand every participant a participant sheet and ask them to complete the participant form on the reverse of the participant sheet, sign it and return it to you before you start the session.

Once you have gathered the participant agreement forms, please give each participant a handout for their use during the session.

1. Explain to participants that the session will be in two parts, each consisting of about 30 minutes discussion around first, the DPIA Data Wheel Questions and second, the risks in changing the process.

2. Also explain that at the end of the session all the seminar groups will go back to the main seminar room for a re-cap session where each group will present a brief overview of the main risks they came up with in the session.

3. If possible, identify and appoint a note taker for the session who will note down the main risks agreed on in part two and a presenter who will present the main risks identified in the session to their peers in the recap session that will be held straight after the seminar. You may to leave this part until nearer the end. I will leave that up to you to decide which is going to work best for you.

Part 1 - Data Wheel Review

Please allow approximately 30 minutes for this part of the discussion - at the end of half an hour bring the discussion to a close and move to part 2. For this section use the Data Wheel Tab on the spreadsheet.

1. To start with what I would like you to do is conduct a review of the original Data Wheel that was completed for the paper-based process. This involves talking through the Data Wheel answers that the Charity provided for the paper based existing process. These answers they gave have been included in the handout that you have given each participant. You will have a spread sheet based version of the same information and basically, it is a case of asking each question and then letting the group decide whether the change in the process will change the answer to that question and, if so, how.

2. Be aware that the handout does not include all the questions and answers - the ones not in the handout have been highlighted in green on your spreadsheet

3. Please note down any changed answers on your spreadsheet as the group works through the questions.

4. In particular, I would like you to discuss the questions around context both in the data and the wheel ? this is where most of the debate is likely to take place as different people have different tolerances, values and norms.

Part 2 - Risk Register

Please allow approximately half an hour for this part of the discussion being mindful that the evaluation sheets will need to be handed out and completed by participants by 12. I would

therefore suggest you wrap up this session at around 11.45 to allow time for nominating a speaker for the review session back in the main seminar room and the evaluation part. For this part of the seminar session use the Risk Register tab on the spread sheet

For the second part of the seminar we are concerned with ascertaining what the risks might be in changing the process from paper to electronic.

- Please start off the discussion with the group around what risks to privacy there might be in the new process. These by their nature will include security risks as any security breach could result in a privacy breach and vice versa.

- For each risk, please note down the risk and then ask the group to score the risk on severity, likelihood and impact for each score, there is a drop down list on the spreadsheet.

- For each risk, ask the group what they consider might be good mitigation strategy to eliminate or reduce the risk and note any responses on the spreadsheet.

- Towards the end of the session (around 11.45) wrap up the discussion and work with the group to agree which of the risks discussed are the main risks they have identified as part of the session and who will present these.

At the end of the session

Please give each participant an evaluation form and ask him or her to complete this and return it to you. Each session will be numbered so if they could indicate the session number on the form that would be helpful.

H. Training/Workshop Handout

GDPR Principes

Principle 1 Lawfulness, fairness and transparency:

- Lawful: Determine and define what is your lawful basis for processing the data;
- Fair: use & process the data fairly with data subjects interest in mind;
- Transparency: Inform the data subject(s) what data processing will be done.

Principle 2 Purpose Limitation:

- Data should be obtained only for specific, lawful purposes;
- Only collect relevant and necessary data, and process data fairly with data subjects interest in mind.

Principle 3 Data Minimisation:

- Data collected should be adequate, relevant and not excessive;
- This means you should collect minimum data i.e. only collect data that is needed for your specified purpose.

Principle 4 Accuracy:

- Keep data up to date and accurate

Principle 5 Storage Limitation:

- Anonymise or pseudonymise data as soon as practicable and keep for no longer than absolutely necessary;
- Securely delete and/or destroy data no longer needed.

Principle 6 Integrity and confidentiality

- Ensure appropriate security measures in place;
- Process and store the data securely ensuring data is protected from harm, unauthorised or unlawful access;
- Ensure all staff are trained in how to safely & securely handle and process data.

Data Protection Impact Assessment (DPIA): When should we conduct a DPIA?)

DPIA Compulsory

New Technologies Using new and/or innovative new processes or technologies;

Profiling/Automated Processing Use of extensive or systematic profiling or automated processing or decision making relating to the data subjects upon which significant decisions about people may be based;

Large Scale Sensitive Data Large scale processing of criminal offence or special category data;

Extensive Systematic Monitoring Large scale systematic monitoring of a public space or publicly accessible space;

Genetic/Biometric Processing of genetic or biometric data;

Data Linking Any form of linking, matching or combining of data from several sources;

Tracking Conducting processing or collect data that involves any form of tracking of behaviour and/or location of people either on- or off-line;

Children Providing online services to children and/or process data relating to children for marketing, profiling or automated decision-making

Potential Harm Conduct processing that involves personal data that, if a breach occurred, could result in mental, physical or other harm to the data subjects;

Evaluation/Scoring The processing of personal data to be used for scoring or evaluation.

DPIA Advisable:

Across Borders Contract Offering goods or services to data subjects or monitoring their behaviour in multiple EU member states;

Free Movement across Borders Conduct any form of processing that could substantially affect the free movement of data subjects with the EU;

Systematic Monitoring Conducting any type of systematic monitoring;

Sensitive Data Processing of highly sensitive or personal data;

Large Scale Processing Any large-scale processing of data;

Vulnerable people Processing of any type of data relating to vulnerable people;

New Technologies Planning to use, implement or involve the use of emerging or innovative new technological or organisational solutions;

Withholding Access Any form of data handling that involves preventing the data subjects from gaining access to or using a service or contract or exercising a right.

The DPIA Data Wheel

	The Need for a DPIA	
D	**Data**	Will a new system, project or process be implemented that involves processing, transmitting, sharing and/or storing of data or are there any changes to an existing system, project or process?
P	**Protection**	Looking at the "when should we conduct a DPIA" list opposite, will the system, project or process involve processing or using any of the types of data listed in the first column ("DPIA Compulsory")
I	**Impact**	Looking at the "when should we conduct a DPIA" list opposite, will the system, project or process involve processing or using any of the types of data listed in the second column ("DPIA Advisable")
A	**Assessment**	Based on the answers above, DPIA required?

Table 3: DPIA Data Wheel - pre-assessment

DATA		
D	**Description**	What is the purpose of the data collection/processing?
		What is the system, process, project or dataset about (subject matter/context)?
A	**Attributes**	Please describe what data will/has be/been collected? (you may wish use/refer to the Data Register for more detailed data collection/guidance)
T	**Transmission Principles**	How will the data be processed internally within the organisation?
		How will the data be transmitted between stakeholders internally and externally? (you may wish use/refer to the life of the form for more detailed data collection/guidance)
A	**Actors**	Please list all staff/roles (actors) who will be processing/using the data
		Please record who is the data processor(s), data controller, data subject and any other internal and external stakeholders who will use/access the data and what their role is
Context	**Prevailing Context**	What are the relationships between actors? (please describe role and relationships between data- controller, processor(s) and Subjects)
		Was/is the data collected with a view to process beyond its original purpose?
		Does data originate from third party source (if so, please state origin of the data)
		Is/was data collected directly from data subject?
		Has/will permission/consent been/be sought for processing of the data from data subject(s)?
		Was consent sought from the data subject for secondary processing purposes?
		If yes, were there any limitations on secondary purpose to which consent was given?
		Has/will the data subject been/be informed of their rights to withdraw consent?
		Are there any overriding considerations as to why primary processing should be allowed despite lack of consent/limited consent?
		Are there any overriding considerations as to why secondary processing should be allowed despite lack of consent/limited consent?

Table 4: DPIA Data Wheel - DATA

WHEEL		
W	**What**	What is the purpose of the data collection/processing?
	Why	Why is the data being collected/processed?
		What are the benefits of the processing for the data subject?
		What are the benefits of the data processing for you (the organisation)?
H	**How**	How will the data be collected?
		How much data will be collected?
		How is/will the data be accessed and used/processed?
		Who is responsible for security around manual data handling, processing or storing?
E	**Extent**	What is the extent of the processing - will we require consent?
		Security - how is/will the data be protected and kept safe?
		How will data handling boundaries be set, measured and controlled?
		Who is responsible for security around manual data handling, processing or storing
		Who is responsible for access control and data security (electronic data handling, processing or storing)?
E	**Exposure**	How is/will compliance be measured and controlled?
E	**Expectations**	How is/will compliance be evidenced?
		Data subject right to access and erasure requests, how is/will this be managed/accommodated?
		How will we meet stakeholders expectations and adhere to data subjects rights?
L	**Life Cycle**	How is/will the data be stored?
		How much data will be collected?
		Life of the form - what journey(s) will the data take as part of its lifecycle?
		Data storage and retention?
Context	**Surrounding Context**	Could the data collection or processing be perceived to infringe upon any social or moral roles, values or norms? (please explain whose values, roles or norms and how they might be infringed upon)?

Table 5: DPIA Data Wheel - WHEEL

I. Training/Workshop Evaluation Form

All information provided will be used to inform and improve future training sessions.
For each of the questions below, please circle the response that best describes how you feel about the statement:

Overall How do you feel your knowledge has improved regarding:		
GDPR?	Yes	No
DPIAs?	Yes	No
Would you be comfortable explaining GDPR to your friends and Colleagues?	Yes	No
Would you be comfortable explaining what a DPIA is to your friends and Colleagues?	Yes	No

Rating today's session:					
Overall how would you rate today?s training session?	Excellent	Very Good	Good	Fair	Poor
How much of the information provided today on GDPR was new to you?	All of it	Most of it	About half	Some of it	None of it
How likely are you to now use and apply the knowledge you have learned in your daily work	Extremely likely	Very likely	Moderately Likely	Slightly likely	Not at all likely
How much of the information provided to you on DPIAs was new to you?	All of it	Most of it	About half	Some of it	None of it
How confident would be in conducting a DPIA for a new or existing project?	Very confident	Mostly confident	Reasonably confident	A bit hesitant	Not confident at all
How likely would you be to recommend this training session to a colleague or friend?	Extremely likely	Very likely	Moderately Likely	Slightly likely	Not at all likely

Please answer the following questions using your own words:	
What did you like about today?s session	
What do you feel went well?	
What did you dislike about today?s session	
Are there any aspects that you would like to learn more about or that you feel could be clarified better?	
Any other Comments/Suggestions?	

Table 6: Post-training Questionnaire

J. Facilitator De-brief

Facilitator debrief - DPIA Seminar Sessions Thank you very much for agreeing to and helping out on the day with the DPIA Seminar Sessions that took place on Monday 11th June 2018 as part of the GDPR for Charities: How to conduct a DPIA Workshop.

I hope you enjoyed the day, the session and the round the table discussion within your seminar group.

Please could you send me the completed spread sheet with the Data Wheel answers and risks identified within the group as part of the session.

I would also appreciate it, if you would take a few minutes to provide me with some feedback on what worked, what did not work and what you believe should be changed/added or removed for future sessions.

Facilitator Feedback:

Please answer the following questions about your experience as a facilitator on the DPIA Data Wheel:	
How comfortable were you that you had been given sufficient details and direction for facilitating the session?	
Were there any aspects of the instructions that you were provided with prior to the session that you feel were omitted/should have been included and, if so, please explain	
What do you feel went well?	
What do you feel did not go so well?	
What did you dislike about the session	
Are there any aspects of the session that you feel should have been omitted as part of the session?	
Any other Comments/Suggestions?	